

1 XAVIER BECERRA
Attorney General of California
2 CHRISTINA BULL ARNDT
Supervising Deputy Attorney General
3 MITCHELL E. RISHE
Deputy Attorney General
4 State Bar No. 193503
300 South Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6394
6 Fax: (916) 731-2121
E-mail: Mitchell.Rishe@doj.ca.gov
7 *Attorneys for the California Department of*
Conservation, Division of Oil, Gas & Geothermal
8 *Resources*

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10 IN THE UNITED STATES BANKRUPTCY COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 NORTHERN DIVISION
13

14 **In re:**

15 **HVI CAT CANYON, INC.,**

16 Debtor.

Case No.: 9:19-bk-11573-MB

Assigned to Hon. Martin R. Barash

Chapter 11

17 **CALIFORNIA DEPARTMENT OF**
18 **CONSERVATION, DIVISION OF**
19 **OIL, GAS & GEOTHERMAL**
RESOURCES' JOINDER TO:

20 **(1) CALIFORNIA STATE LANDS**
21 **COMMISSION'S LIMITED**
22 **OBJECTION TO APPLICATION**
23 **FOR ORDER AUTHORIZING**
24 **AND APPROVING THE**
25 **EMPLOYMENT OF PACHULSKI**
26 **STANG ZIEHL & JONES LLP AS**
27 **COUNSEL FOR THE OFFICIAL**
28 **COMMITTEE OF UNSECURED**
CREDITORS, EFFECTIVE AS OF
AUGUST 16, 2019 [Docket No.
346]; and

(2) CALIFORNIA STATE LANDS
COMMISSION'S LIMITED
OBJECTION TO APPLICATION

**OF THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS
FOR AUTHORIZATION TO
RETAIN AND EMPLOY CONWAY
MACKENZIE, INC. AS
FINANCIAL ADVISOR,
EFFECTIVE AS OF AUGUST 16,
2019 [Docket No. 347]**

Date: October 28, 2019
Time: 10:00a.m.
Place: Courtroom 201
U.S. Bankruptcy Court
1415 State Street
Santa Barbara, CA 93101
Judge: Hon. Martin R. Barash

The California Department of Conservation, Division of Oil, Gas & Geothermal Resources, hereby joins: (1) the California State Lands Commission's Limited Objection to Application for Order Authorizing and Approving the Employment of Pachulski Stang Ziehl & Jones LLP as Counsel for the Official Committee of Unsecured Creditors, Effective as of August 16, 2019 ("PSZJ Objection") [Docket No. 346]; (2) the California State Lands Commission's Limited Objection to Application of the Official Committee of Unsecured Creditors for Authorization to Retain and Employ Conway MacKenzie, Inc. as Financial Advisor, Effective as of August 16, 2019 ("CM Objection") [Docket No. 347]; and (3) the California State Lands Commission's Response to Reply of the Official Committee of Unsecured Creditors to the PSZJ Objection and CM Objection ("Reply") [Docket No. 422].

The Division opposes the Official Committee of Unsecured Creditors' applications to employ Pachulski Stang Ziehl & Jones LLP as counsel to the Official Committee of Unsecured Creditors [Docket No. 214], and to employ Conway MacKenzie, Inc. as financial advisor to the Official Committee of

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2 Unsecured Creditors [Docket No. 219], for the reasons set forth in the PSZJ
3 Objection, the CM Objection, and the Reply.
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5 Dated: October 22, 2019

Respectfully submitted,

6 XAVIER BECERRA
7 Attorney General of California
8 CHRISTINA BULL ARNDT
Supervising Deputy Attorney General

9 */s/ Mitchell E. Rishe*

10 MITCHELL E. RISHE
11 Deputy Attorney General
12 *Attorneys for the California*
13 *Department of Conservation,*
14 *Division of Oil, Gas & Geothermal*
15 *Resources*
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

300 South Spring Street, Suite 1702
Los Angeles, California 90013

A true and correct copy of the foregoing document entitled:

**CALIFORNIA DEPARTMENT OF CONSERVATION, DIVISION OF OIL, GAS & GEOTHERMAL RESOURCES'
JOINDER TO:**

**(1) CALIFORNIA STATE LANDS COMMISSION'S LIMITED OBJECTION TO APPLICATION FOR ORDER
AUTHORIZING AND APPROVING THE EMPLOYMENT OF PACHULSKI STANG ZIEHL & JONES LLP AS
COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, EFFECTIVE AS OF AUGUST 16,
2019 [Docket No. 346]; and**

**(2) CALIFORNIA STATE LANDS COMMISSION'S LIMITED OBJECTION TO APPLICATION OF THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR AUTHORIZATION TO RETAIN AND EMPLOY CONWAY
MACKENZIE, INC. AS FINANCIAL ADVISOR, EFFECTIVE AS OF AUGUST 16, 2019 [Docket No. 347]**

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b)
in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General
Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On October
22, 2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the
following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See Attachment

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On October 22, 2019, I served the following persons and/or entities at the last known addresses in this bankruptcy case or
adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class,
postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will
be completed no later than 24 hours after the document is filed.

Office of the U.S. Trustee
Brian Fittipaldi
1415 State Street, Suite 148
Santa Barbara, CA 93101

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method
for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on October 22, 2019, I served the
following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to
such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration
that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is
filed.

Via Overnight Delivery
Hon. Martin R. Barash
United States Bankruptcy Court
Central District of California
21041 Burbank Boulevard, Suite 342 / Courtroom 303
Woodland Hills, CA 91367

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/22/2019

Date

Alfred Palma

Printed Name

/s/ Alfred Palma

Signature

VIA NOTICE ELECTRONIC FILING (NEF)

Alicia Clough on behalf of Creditor California State Lands Commission
aclough@loeb.com; mnielson@loeb.com; ladocket@loeb.com

Marc S Cohen on behalf of Creditor California State Lands Commission
mscohen@loeb.com; klyles@loeb.com

William C Beall on behalf of Creditor GLR, LLC
will@beallandburkhardt.com; carissa@beallandburkhardt.com

Karl J Fingerhood on behalf of Interested Party United States of America on behalf of USEPA and US Coast Guard
karl.fingerhood@usdoj.gov; efile_ees.enrd@usdoj.gov

H Alexander Fisch on behalf of Interested Party California Department of Fish & Wildlife
Alex.Fisch@doj.ca.gov

H Alexander Fisch on behalf of Interested Party California Regional Water Quality Control Board, Central Coast
Alex.Fisch@doj.ca.gov

Don Fisher on behalf of Interested Party
dfisher@ptwww.com; tblack@ptwww.com

Brian D Fittipaldi on behalf of U.S. Trustee United States Trustee
brian.fittipaldi@usdoj.gov

Gisele M Goetz on behalf of Interested Party
gmgoetz@hbsb.com; ggoetz@collegesoflaw.edu

Karen L Grant on behalf of Creditor BUGANKO, LLC
kgrant@silcom.com

Ira S Greene on behalf of Interested Party CTS Properties, Ltd.
Ira.Greene@lockelord.com

Matthew C. Heyn on behalf of Creditor Department of Conservation, Division of Oil, Gas and Geothermal Resources
Matthew.Heyn@doj.ca.gov; mcheyn@outlook.com

Brian L Holman on behalf of Creditor Bradley Land Company
b.holman@musickpeeler.com

Eric P Israel
eisrael@dgdk.com; danninggill@gmail.com; eisrael@ecf.inforuptcy.com

Razmig Izakelian on behalf of Creditor GIT, Inc.
razmigizakelian@quinnemanuel.com

Alan H Katz on behalf of Interested Party CTS Properties, Ltd.
akatz@lockelord.com

John C Keith on behalf of Creditor California State Lands Commission
john.keith@doj.ca.gov

Jeannie Kim on behalf of Interested Party Pacific Gas and Electric Company
jkim@buchalter.com; docket@buchalter.com

Brian M Metcalf on behalf of Interested Party UBS AG, London Branch
bmetcalf@omm.com

Michael L Moskowitz on behalf of Debtor HVI Cat Canyon, Inc.
mlm@weltmosk.com; jg@weltmosk.com; aw@weltmosk.com

David L Osias on behalf of Creditor Allen Matkins Leck Gamble Mallory & Natsis LLP
dosias@allenmatkins.com; bcrfilings@allenmatkins.com; kdemorest@allenmatkins.com;
csandoval@allenmatkins.com

Darren L Patrick on behalf of Interested Party UBS AG, London Branch
dpatrick@omm.com; darren-patrick-1373@ecf.pacerpro.com

Jeffrey N Pomerantz on behalf of Creditor Committee Official Committee of Unsecured Creditors
jpomerantz@pszjlaw.com

Todd C. Ringstad
becky@ringstadlaw.com; arlene@ringstadlaw.com

Mitchell E Rishe on behalf of Creditor Department of Conservation, Division of Oil, Gas and Geothermal
Reources
mitchell.rishe@doj.ca.gov

Daniel A Solitro on behalf of Interested Party CTS Properties, Ltd.
dsolitro@lockelord.com; ataylor2@lockelord.com

Ross Spence on behalf of Interested Party County of Santa Barbara, California
ross@snowspencelaw.com; janissherrill@snowspencelaw.com; donnasutton@snowspencelaw.com;
brittanyDecoteau@snowspencelaw.com

Ross Spence on behalf of Interested Party Harry E. Hagen, as Treasurer-Tax Collector of the County of
Santa Barbara, California
ross@snowspencelaw.com; janissherrill@snowspencelaw.com; donnasutton@snowspencelaw.com;
brittanyDecoteau@snowspencelaw.com

Ross Spence on behalf of Interested Party Santa Barbara Air Pollution Control District
ross@snowspencelaw.com; janissherrill@snowspencelaw.com; donnasutton@snowspencelaw.com;
brittanyDecoteau@snowspencelaw.com

Christopher D Sullivan on behalf of Creditor Diamond McCarthy LLP
csullivan@diamondmccarthy.com; mdomer@diamondmccarthy.com; kmartinez@diamondmccarthy.com

Jennifer Taylor on behalf of Interested Party UBS AG, London Branch
jtaylor@omm.com

Salina R Thomas on behalf of Interested Party
bankruptcy@co.kern.ca.us

Salina R Thomas on behalf of Interested Party Kern County Treasurer Tax Collector
bankruptcy@co.kern.ca.us

Fred Whitaker on behalf of Interested Party Eller Family Trust
lshertzer@cwlawyers.com

Emily Young on behalf of Creditor Epiq Corporate Restructuring, LLC Claims Agent
pacerteam@gardencitygroup.com; rjacobs@ecf.epiqsystems.com; ECFinbox@epiqsystems.com